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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA CORPORATE HEADQUARTERS, A
Nevada Corporation,

Plaintiff,

vs.

JANETTE M. HILL; JOHN DOE; ATTORNEY
DOE; and DOES 1 through X and ROE Corporations
or Business Entities I through X, inclusive,

Defendants.

Case No.: 2:20-cv-01721-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
COUNTERCLAIMANT ALFONSO
VALLE TO RESPOND TO
DEFENDANT/
COUNTERCLAIMANT'S
COUNTERCLAIM**

JANETTE M. HILL, individually,

Counterclaimant,

vs.

NEVADA CORPORATE HEADQUARTERS, A
Nevada Corporation; JASON WILLIAMS,
individually; ALFONSO VALLE, individually,

Counterdefendants.

IT IS HEREBY STIPULATED by and between Counter-Defendant Alfonso Valle ("Valle"), through his counsel of record, Gordon Rees Scully Mansukhani, LLP, and Defendant/Counterclaimant Janette M. Hill ("Counterclaimant"), through their counsel of record,

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1 Lagomarsino Law, that Counter-Defendant shall have a fourteen-day extension of time to submit
2 his response to Counterclaimant's Counterclaim. This stipulation is submitted and based upon
3 the following:

4 1. On February 5, 2020, Plaintiff/Counter-Defendant Nevada Corporate
5 Headquarters ("NCH") filed a Complaint in the Eighth Judicial District Court, Clark County,
6 Nevada, case no. A-20-809853-C, against Defendant/Counterclaimant Hill. On July 1, 2020,
7 NCH filed an Amended Complaint.

8 2. On August 17, 2020, Counterclaimant filed a Counterclaim against Counter-
9 Defendants Valle, NCH, and Jason Williams ("Williams") (collectively, Valle, NCH, and
10 Williams are referred to as "Counter-Defendants").

11 3. On September 15, 2020, Valle notified Counterclaimant that service of the
12 Counterclaim was deficient, and agreed to accept service of the Counterclaim by electronic
13 means. Valle further agreed to file a response to the Counterclaim on October 6, 2020

14 4. On September 16, 2020, NCH filed a Notice of Removal to the United States
15 District Court, District of Nevada. *See* ECF No. 1.

16 5. Currently pending before this Court is NCH and Williams' Stipulation to Extend
17 Deadline for Plaintiff and Counter-Defendants to Respond to Defendant/Counterclaimant's
18 Counterclaim. *See* ECF No. 6. Therein, NCH and Williams seek an extension to file a response
19 to the Counterclaim because Defendant/Counterclaimant intends to file an Amended
20 Counterclaim on or before October 5, 2020 in order to address administrative remedies and the
21 inclusion of individually named defendants as parties in alleged Title VII violations. *Id.*

22 6. In light of the forthcoming First Amended Counterclaim,
23 Defendant/Counterclaimant and Valle have agreed that Valle shall forego filing a response to the
24 Counterclaim and have fourteen (14) days from the filing date of the First Amended
25 Counterclaim to file a response.

26 7. This is the first request for an extension of time for Valle to file a response to
27 Defendant/Counterclaimant's Counterclaim.

8. This request is made in good faith and not for the purpose of delay.

Dated: September 24, 2020

Dated: September 24, 2020

**GORDON REES SCULLY
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LAGOMARSINO LAW

/s/ Dione C. Wrenn

/s/ Andre M. Lagomarsino

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 9-25-2020

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